

1 JANE / JOHN DOE

2 Email: JWHater@protonmail.com

3

4 *Pro se*

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6 **IN THE UNITED STATES DISTRICT COURT FOR THE**
SOUTHERN DISTRICT OF NEW YORK

7

8 IN RE: DMCA SUBPOENA TO GOOGLE, LLC | Case No.: 7:20-mc-00119

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10 **JANE / JOHN DOE'S REQUEST FOR**
ADDITIONAL BRIEFING BY THE WATCH
TOWER REGARDING OTHER BOGUS
DMCA TAKE DOWN REQUESTS

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15 In addition to the **58** actual DMCA subpoena requests that have been filed in this

16 specific court, and the other **2** filed elsewhere, *Jane / John Doe* would like to point out

17 to the Court that the Watch Tower and its attorney Paul Polidoro have also been

18 sending out DMCA Takedown Notices to YouTube regarding literally **hundreds** of

19 JW Apostate video channels and those of a similar type (under various pseudonyms)

20 over the past several years.

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23 As the Court knows, in *Lenz v. Universal Music Corp.*, 801 F.3d 1126 (9th Cir.

24 2015), the United States Court of Appeals for the Ninth Circuit has held that copyright

25 holders must consider fair use in good faith before issuing a takedown notice for

26 content posted on the Internet. Lenz argued that Universal was issuing takedown

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1 notices in bad faith, as they attempted to remove all Prince-related content rather than
2 considering whether each posting violated copyright, and in particular was a non-
3 infringing fair use.
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5 Importantly, the court viewed fair use not as a valid excuse to otherwise
6 infringing conduct but rather as not infringement in the first place.
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8 **For at least five years, the Watch Tower and its attorneys have been issuing**
9 **DMCA notices in bad faith as they attempt to remove all Watch Tower-related**
10 **content from the internet, except that which they release directly themselves.**
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12 Just a few weeks ago, YouTube received DMCA Takedown Notices from the
13 Watch Tower regarding the *JW Brainwashing* channel (an Apostate channel), which
14 contained nothing but transformative parody videos making fun of the Watch Tower
15 pedophile organization and its Governing Body (who are also pedophiles, in case
16 anyone was wondering).
17

18 Obviously, it is much easier for the Watch Tower to escape public scrutiny by
19 sending off DMCA Takedown Notices to social media companies like YouTube,
20 Facebook, Twitter, et al. via email for free. After all, for well **over five years** they
21 have been sending Takedown Notices to the web hosting companies for *JW Survey.org*
22 and *AvoidJW.org*, all Apostate websites, as well as the *John Ceders* YouTube channel,
23 in an effort to stifle public debate and criticism. As well as trying to cover up
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1 documents that expose their chronic pedophilia scandals and lawsuits. (And how's
2 that working for ya?)
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4 When the Court takes up the issue as to whether or not the Watch Tower is
5 properly invoking this Court's authority under the DMCA subpoena process, it is
6 important for you, Judge Siebel, to get a full understanding as to just how widespread
7 and chronic this behavior has been – for many years, across many jurisdictions.
8

9 Maybe you thought that this was just a one-off dispute involving the Watch
10 Tower and just one little YouTube channel. But, as you quickly seemed to realize, the
11 issuance of 60 DMCA subpoenas – but no actual copyright lawsuits – is just a part of
12 their lawfare scheme to uncover moles, whistleblowers, and apostates, in an effort to
13 stifle debate and criticism. **It is just a religious witch hunt via judicially approved**
14
15 **doxing.**
16

17 *Jane / John Doe* has used literally a hundred or more aliases over the years
18 expressly for setting up throw-away YouTube and other social media accounts.
19 Unfortunately, YouTube isn't a court of law. So, they will just takedown the videos to
20 appease the Watch Tower lawyers and there is nothing an account holder can do.
21
22 YouTube doesn't give a shit about its individual users.
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24 But, again, this lack of good faith when making these DMCA takedown
25 requests, and in applying for DMCA subpoenas, is exactly what this case is all about.
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1 **REMEMBER:** Lying under oath is what they do as it is specifically called for in their
2 doctrine of *Theocratic Warfare*.

3
4 Regardless as to what the Court rules in this specific case, this DMCA subpoena
5 litigation will not go away. Not anymore, never again. Now that I am paying better
6 attention and know what to do, I will be filing DMCA objections each and every time
7 the Watch Tower pedophiles file a request for a subpoena, in any court and in any
8 jurisdiction across this country. Just so you know, I sent Philip Brumley, General
9 Counsel for the Watch Tower organization, an email a couple days ago letting him
10 know that his DMCA antics were coming to an end:

11
12 *I will [mess] you up, Brumley. Make no doubt about it - I meant every word I said in that
13 reply [Jane/John Doe's reply in support of DMCA objections].*

14
15 *You know I have been to your Bethel headquarters before, twice, with my daughter. Once at
16 the old DUMBO place a long while ago and the second was about a year and a half ago at
17 your new place. We saw each other one time, though I am certain you would not
18 remember. Just because I think your cult is a scam and is stupid does not mean that I won't
make my daughter and her choices feel any less respected. It took a while, but she and her
husband have woken up and now see you people for what you truly are.*

19
20 *You clowns have been peppering me with dozens of the DCMA subpoenas, under one
pseudonym or another, for a long time. It was only by chance, due to the stay-at-home
orders, that I finally took notice and decided to do something once and for all to put your
lawfare games to an end.*

21
22 *You can change computer passwords all you want. Even change the locks at the Kingdom
Halls and Branch Offices and their 'secret' file cabinets. Passwords and locks only defend
against outsiders. It does no good as it will not protect you from trusted insiders who stopped
caring - PIMO is the word you people use to describe them, right? Physically In / Mentally
Out.*

23
24 *Think Edward Snowden and the NSA leaks. And you jabronis are still no closer to plugging
these leaks!*

1 The Watch Tower organization has been covering up child sex abuse for
2 DECADES, in countries all over the world – and ALL of these coverups have been
3 specifically directed by Philip Brumley and the other attorneys who live at the Bethel
4 compound (think *Branch Davidians*, but with more pillow-humping and a nice lake
5 nearby).
6

7 Thanks to the wonders of electronic filing, not only is it easier to request DMCA
8 subpoenas, but it is also super easy to file DMCA objections and demand hearings
9 (which is all free of charge for the objector, once you figure out the “magical” words to
10 use in order to invoke the Court’s ability to take up a motion to quash).
11

12 This, of course, takes up the court’s valuable time from other super important
13 stuff like trying to hassle our President over nonsense like the fake-news Muller report
14 or nonissues like his tax records (all stuff going in here in the SD of NY).
15

16 In any event, you hopefully get the point. From now on, should the Watch
17 Tower pedophiles come to court to request a DMCA subpoena, in any district in this
18 country, I will respond and object. But if you can draw a line in the sand here and
19 now, Judge Siebel, this bad faith use of the DMCA just so they can go after apostates
20 and whistleblowers can come to an end – and save you all a whole bunch of time and
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1 Therefore, I ask that you please order the Watch Tower to fully disclose to you
2 all of the DMCA takedown requests that they have made since January 1, 2015, to the
3 present date. Every single one of them.
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6 Respectfully submitted,
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11 Dated: April 9, 2020

12 /s/
13 Jane / John Doe
14 *Pro se*

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CERTIFICATE OF SERVICE

I certify that on April 9, 2020, a copy of this document was filed electronically with the US District Court Clerk's office via their pro se e-filing system, which will automatically serve a Notice of Electronic Filing on the Watch Tower organization.

I certify that Watch Tower attorney (and pedophile) Paul Polidoro is a registered CM/ECF user / registered sex offender and that service will be accomplished by the CM/ECF system.

/s/
Jane / John Doe
Pro se

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